

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION

LUCAS UBAH and LARRY TAYLOR,	§	
individually and on behalf of all others	§	
similarly situated,	§	
	§	
Plaintiffs,	§	Civil Action No. 7:16-CV-00122
v.	§	
	§	
SUN COAST RESOURCES, INC.	§	Jury Trial Demanded
	§	
Defendant.	§	

**SUN COAST RESOURCES, INC.’S AGREED MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS’ COMPLAINT**

Defendant Sun Coast Resources, Inc. (“Sun Coast”) hereby respectfully moves for an extension of time to answer or otherwise respond to the Original Complaint [Dkt. 1] of Plaintiffs Lucas Ubah and Larry Taylor (“Plaintiffs”). Sun Coast’s Answer or other response(s) to the Original Complaint are currently due on Wednesday, June 15, 2016. The present motion requests a short extension until and including Wednesday, June 29, 2016, for Sun Coast to answer or otherwise respond to Plaintiffs’ Original Complaint. Counsel for Sun Coast has conferred with counsel for Plaintiffs with respect to this motion for extension, and the motion is agreed. This motion is not brought for the purpose of delay, but rather to promote judicial efficiency and so that justice may be done.

Nothing contained in this motion shall be deemed to constitute a waiver of, and Sun Coast does not waive but expressly preserves, any and all rights and defenses that may be available in this action.

Accordingly, Sun Coast respectfully requests the Court to enter the attached proposed Order, extending its deadline to answer or otherwise respond to Plaintiffs' Original Complaint to Wednesday, June 29, 2016.

Dated: June 9, 2016

Respectfully submitted,

/s/ Cristina Portela Solomon

Cristina Portela Solomon
Texas State Bar No. 16143400
csolomon@gardere.com
1000 Louisiana Street, Suite 2000
Houston, Texas 77002
Telephone: (713) 276-5500
Facsimile: (713) 276-5555

LEAD ATTORNEY FOR DEFENDANT SUN
COAST RESOURCES, INC.

Of Counsel:

Neil Martin
Texas State Bar No. 13096000
nmartin@gardere.com

GARDERE WYNNE SEWELL LLP
1000 Louisiana, Suite 2000
Houston, Texas 77002
Telephone: (713) 276-5500
Facsimile: (713) 276-5555

CERTIFICATE OF CONFERENCE

I hereby certify that on June 8, 2016, my office conferred with Plaintiffs' counsel of record regarding the foregoing motion. Counsel for Plaintiffs stated that Plaintiffs are agreed to the relief requested by Defendant herein.

/s/ Cristina Portela Solomon

Cristina Portela Solomon

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 9th day of June, 2016, via CM/ECF on counsel of record for Plaintiffs.

/s/ Cristina Portela Solomon

Cristina Portela Solomon